

DECLARATION OF MICHAEL LEE HERTZBERG

I, Michael Lee Kertzberg, hereby declare and state:

1. I am a resident of the City of New York, State of New York. My residence address is 171 West 57th Street, New York, New York 10019. My law office address is 740 Broadway - 5th Floor, New York, New York 10003.

2. I was admitted to practice before all courts of New York State on May 8, 1975, to the Washington, D.C. Bar in November, 1981 and to the Bar of the United States Court of Appeals for the Ninth Circuit on July 21, 1986. I am an attorney in good standing in all courts of New York State, the District of Columbia Bar and the Ninth Circuit Court of Appeals, as well as the Bar of the Supreme Court of the United States to which I was admitted on February 23, 1987. I am currently not, nor have I ever been, suspended or disbarred in any court.

3. In the preceding two years I have applied for and been granted leave to appear as counsel pro hac vice in two consolidated cases before Hon. Harry L. Hupp in the United States District Court for the Central District of California entitled: United States v. Church of Scientology International, No. 90-36990 RSWL and United States v. Church of Scientology Western United States, No. 90-3390 JRX.

5. I am fully familiar with the facts, files and proceedings in the instant action. Indeed, I have been involved in the various direct and ancillary proceedings in litigation involving Gerald Armstrong from 1985 to the present. This includes an appearance at the hearing before Hon. Bruce Geernaert

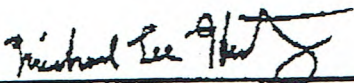
1 on December 23, 1991 which is directly related to the matters
2 presently before this court in the instant lawsuit.

3 6. I am fully familiar with the standards of professional
4 conduct required of members of the State Bar of California.

5 7. In the event that this petition for my admission to the
6 case herein as counsel pro hac vice is granted, I hereby
7 designate Andrew H. Wilson as my local counsel. Mr. Wilson is a
8 member in good standing of the California Bar. His office
9 address is Wilson, Blum & Campilongo, 235 Montgomery Street,
10 Suite 450, San Francisco, California 94104 and his office
11 telephone number is (415) 391-3900. Mr. Wilson can receive
12 service of papers at that address and is readily available for
13 communication with the Court regarding the conduct of this case.

14 Executed this 13th day of March, 1992 at New York, New York.

15 I declare under penalty of perjury and the laws of the
16 State of California and New York that the foregoing is true and
17 correct.

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20 Michael Lee Hertzberg